

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

JOSEPH FRIEL, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiff,

v.

**LINE 5, LLC, HEADSTART
WARRANTY GROUP LLC and JEA
MANAGEMENT SERVICES d/b/a
COVERED AUTO,**

Defendants.

CASE NO. 3:24-cv-01866-JKM

Judge: Hon. Julia K. Munley

**DEFENDANT JEA MANAGEMENT SERVICES' MOTION TO
BIFURCATE DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 16, Defendant JEA Management Services d/b/a Covered Auto ("JEA") hereby moves to bifurcate discovery. JEA incorporates by reference its Brief in Support of its Motion as if fully stated herein.

Dated: January 21, 2025

Respectfully submitted,

**NELSON MULLINS RILEY &
SCARBOROUGH, LLP**

/s/ Elyse N. Cohen

Elyse N. Cohen, Esq.

PA Attorney Id. No. 320787

1000 Westlakes Drive, Suite 275

Berwyn, PA 19312

(p): 610-943-5354

Elyse.Cohen@nelsonmullins.com

TROUTMAN AMIN, LLP

Eric J. Troutman, Esq.

CA Bar Id. No. 229263

*(pro hac vice application pending-
1/17/2025)*

Puja Amin, Esq.

CA Bar Id. No. 299547

*(pro hac vice application pending-
1/17/2025)*

Tori L. Guidry, Esq.

LA Bar Id. No. 37704

*(pro hac vice application pending-
1/17/2025)*

400 Spectrum Center Drive, Suite 1550

Irvine, CA 92618

(p): 949-350-3663

*Attorneys for Defendant, JEA Management
Services d/b/a Covered Auto*